From: **Cynthia Caporale/ESC/R3/USEPA/US**
Sent: 3/13/2012 12:24:05 PM

To: Fred Foreman/ESC/R3/USEPA/US@EPA
CC: Robin Costas/ESC/R3/USEPA/US@EPA
Subject: Fw: Verification/Completeness Checks for Dimock (Test America Reports WO15712 and 15814 Posted Mar 08)

Fred,

This is the official response I was planning on sending to Kelley and Deb. Since I am quoting R3 Mods please let me know if you are okay with the responses.

(In the #2 item for both reports the statement "If results <RL are reported as recommended by SW-846 methods, then these results become a 10U" - seems like it should be >RL???

Cindy

----- Forwarded by Cynthia Caporale/ESC/R3/USEPA/US on 03/13/2012 12:22 PM -----

From: Cynthia Caporale/ESC/R3/USEPA/US
To: Ex. 4 - CBI
Cc: Ex. 4 - CBI Gary Newhart/CI/USEPA/US@EPA, John Gilbert/CI/USEPA/US@EPA, Kelley Chase/R3/USEPA/US@EPA, Ex. 4 - CBI, Sella Burchette/ERT/R2/USEPA/US@EPA, Fred Foreman/ESC/R3/USEPA/US, Robin Costas/ESC/R3/USEPA/US
Date: 03/13/2012 11:11 AM
Subject: Re: Verification/Completeness Checks for Dimock (Test America Reports WO15712 and 15814 Posted Mar 08)

Kelley and Deb,

The reports on the Dimock Verification/Completeness Check for Test America Reports WO 15712 and 15814 were reviewed and below are the responses for your consideration.

Test America-Validated Report-R33917 480-15712-1.PDF

1. Method blank (MB 480-50495/1) contained triethylene glycol and diethylene glycol above the method detection limit (MDL). The associated samples are qualified as follows: triethylene glycol is non-detect (U) for samples FB07, HW18, HW26 and HW26-P. Diethylene glycol is non-detect (U) for samples FB07, HW18, HW18-P, HW20, HW20-P, HW25-P, HW26, HW26-P, HW29 and HW29Z. Method blank (MB 480 50613/1-A) contained diethylene glycol above the MDL. The associated samples are qualified as follows: diethylene glycol non-detect (U) for samples HW32, HW32-P, HW33, HW33A-P, HW33B-P, HW34A-P and HW52.

Response: **Elevating the QL and qualifying "U" is not the typical procedure for R3 validation; however, we support the decision to follow the NFG procedures for blank contaminants. Since results were qualified "R" the conclusion is these compounds were not present and, therefore, blank contamination is not applicable.**

2. On qualifications of detections based on a second column analysis, Section 7.6.4 of SW846 8015B states, tentative identification of a single component analyte occurs when a peak from a sample extract falls within the daily retention time window. Confirmation is required on a second column or by GC/MS. Since the flame ionization detector is non-specific, it is highly recommended that GC/MS confirmation be performed on single component analytes unless historical data are available to support the identification(s). The qualification of unusable "R" by the Region 3 validation team is agreed upon for triethylene glycol results for samples HW32 and HW34a if results greater than the MDL but less than the RL are to be reported. If results <RL are reported as recommended by SW-846 methods, then these results become a 10U.
NOTE: Waiting for a response on this issue.

Response: **For instances with dual column confirmation, the Region 3 Modifications to NFG for Organic Data Review state that all target compounds that are not confirmed should be considered non-detected. Therefore, for results above the Reporting Limit (>RL), 10 U would be appropriate. Qualifying results below the Reporting Limit (<RL) as rejected "R" is appropriate.**

3. The holding times were checked from the time of collection on the chain of custody (COC) to the time of analysis on the analysis log sheet. Holding time review was based on a 14-day period. No additional qualifications are required.

Response: **No response needed.**

4. Raw data was not provided, it is assumed that all sample detections were within the established retention time criteria and the stated concentrations in the LCS and MS/MSD tables are correct and pass their QC criteria. No additional qualifications are required.

Response: **Raw data is available and were evaluated during the validation process.**

5. A 4 point initial calibration was used by the laboratory instead of the recommended minimum of 5 points. As previously noted in a response from Fred Foreman on 3/9/12, the lab uses a modified analysis and typically uses a 4-point calibration. No additional qualifications are required.

Resposne: **No response needed.**

Test America-Validated Report-R33917 480-15814-1.PDF

1. Method blank (MB 480-50789/1) contained diethylene glycol above the method detection limit (MDL). The associated samples are qualified as follows: diethylene glycol is non-detect (U) for samples EB02, FB09, HW09-P and HW28a. Method blank (MB 480 51003/1-A) contained diethylene glycol and triethylene glycol above the MDL. The associated samples are qualified as follows: diethylene glycol is non-detect (U) for samples HW40-P, HW41, HW45, HW46 and HW46-P and triethylene glycol is non-detect (U) for samples HW40-P, HW46 and HW46-P.

Response: **Elevating the QL and qualifying "U" is not the typical procedure for R3 validation; however, we support the decision to follow the NFG procedures for blank contaminants. Since results were qualified "R" the conclusion is these compounds were not present and, therefore, blank contamination is not applicable.**

2. On qualifications of detections based on a second column analysis, Section 7.6.4 of SW846 8015B states, tentative identification of a single component analyte occurs when a peak from a sample extract falls within the daily retention time window. Confirmation is required on a second column or by GC/MS. Since the flame ionization detector is non-specific, it is highly recommended that GC/MS confirmation be performed on single component analytes unless historical data are available to support the identification(s). The qualification of unusable "R" by the Region 3 validation team is agreed upon for triethylene glycol results for samples EB02, FB09, HW09 and HW28a, if results greater than the MDL but less than the RL, are to be reported. If results <RL are reported as recommended by SW-846 methods, then these results become a 10U.
NOTE: Waiting for a response on this issue.

Response: **For instances with dual column confirmation, the Region 3 Modifications to NFG for Organic Data Review state that all target compounds that are not confirmed should be considered non-detected. Therefore, for results above the Reporting Limit (>RL), 10 U would be appropriate. Qualifying results below the Reporting Limit (<RL) as rejected "R" is appropriate.**

3. The holding times were checked from the time of collection on the chain of custody (COC) to the time of analysis on the analysis log sheet. Holding time review was based on a 14-day period. No additional qualifications are required.

Response: **No response needed.**

4. Raw data was not provided, it is assumed that all sample detections were within the established retention time criteria and the stated concentrations in the LCS and MS/MSD tables are correct and pass their QC criteria. No additional qualifications are required.

Response: **Raw data is available and were evaluated during the validation process.**

5. A 4 point initial calibration was used by the laboratory instead of the recommended minimum of 5 points. As previously noted in a response from Fred Foreman on 3/9/12, the lab uses a modified analysis and typically uses a 4-point calibration. No additional qualifications are required.

Resposne: **No response needed.**

Cynthia Caporale, Chief
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From: Ex. 4 - CBI
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Cc: John Gilbert/CI/USEPA/US@EPA, Garv Newhart/CI/USEPA/US@EPA, Sella Burchette/ERT/R2/USEPA/US@EPA, "Miller,
Ex. 4 - CBI lmco.com>, Ex. 4 - CBI
Date: 03/13/2012 09:55 AM
Subject: Verification/Completeness Checks for Dimock (Test America Reports WO15712 and 15814 Posted Mar 08)

.....are attached for your review and consideration.

Ex. 4 - CBI
Lockheed Martin
Scientific, Engineering, Response and Analytical Services (SERAS)
Ex. 4 - CBI
732-494-4021 (Fax)